

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

IN RE:

The Roman Catholic Diocese of  
Ogdensburg, New York,

Debtor.

Chapter 11

Case No. 23-60507 (PGR)

---

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE PURSUANT TO  
FED. R. BANKR. P. 2002**

---

**PLEASE TAKE NOTICE** that Berkeley Research Group, LLC (“**BRG**”) hereby appears by its counsel, Timothy Karcher and Paul Possinger of the law firm Proskauer Rose LLP (“**Counsel**”). Counsel hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and requests that the undersigned be added to the official mailing matrix and service lists in the above captioned chapter 11 case. Counsel requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in this chapter 11 case and copies of all papers served or required to be served in this chapter 11 case, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, be given and served upon BRG through service upon Counsel, at the address, telephone, fax, and email addresses set forth below:

Timothy Karcher  
PROSKAUER ROSE LLP

Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Fax: (212) 969-2900  
Email: tkarcher@proskauer.com

and

Paul Possinger  
PROSKAUER ROSE LLP  
70 West Madison, Suite 3800  
Chicago, IL 60602  
Telephone: (312) 962-3550  
Fax: (312) 962-3551  
Email: ppossinger@proskauer.com

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in this case, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, email, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a waiver of any of the rights of the Committee, including, without limitation, to (i) have final orders in non-core matters entered only after de novo review by a higher court, (ii) trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which BRG may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are

expressly reserved.

Dated: New York, New York  
April 29, 2025

PROSKAUER ROSE LLP

/s/ Michael Mervis

Michael Mervis, Esq.  
Attorney Bar Roll No. 515353  
Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Fax: (212) 969-2900  
Email: mmervis@proskauer.com

/s/ Timothy Karcher

Timothy Karcher, Esq. (*pro hac vice* pending)  
Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Fax: (212) 969-2900  
Email: tkarcher@proskauer.com

Dated: Chicago, Illinois  
April 29, 2025

and

/s/ Paul Possinger

Paul Possinger, Esq. (*pro hac vice* pending)  
70 West Madison, Suite 3800  
Chicago, IL 60602  
Telephone: (312) 962-3550  
Fax: (312) 962-3551  
Email: ppossinger@proskauer.com

*Counsel to Berkeley Research Group, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

Dated: New York, New York  
April 29, 2025

PROSKAUER ROSE LLP

/s/ Michael Mervis  
Michael Mervis, Esq.  
Attorney Bar Roll No. 515353  
Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Fax: (212) 969-2900  
Email: mmervis@proskauer.com

/s/ Timothy Karcher  
Timothy Karcher, Esq. (*pro hac vice* pending)  
Eleven Times Square  
New York, NY 10036  
Telephone: (212) 969-3000  
Fax: (212) 969-2900  
Email: tkarcher@proskauer.com

and

Dated: Chicago, Illinois  
April 29, 2025

/s/ Paul Possinger  
Paul Possinger, Esq. (*pro hac vice* pending)  
70 West Madison, Suite 3800  
Chicago, IL 60602  
Telephone: (312) 962-3550  
Fax: (312) 962-3551  
Email: ppossinger@proskauer.com

*Counsel to Berkeley Research Group, LLC*